

**In The Matter Of:**

*In Re: Professional Fee Matters Concerning  
The Jackson Walker Law Firm*

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*Albert Alonzo*

*September 18, 2024*

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*Behmke Reporting and Video Services, Inc.*

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<p style="text-align: right;">Page 13</p> <p>1 WEDNESDAY, SEPTEMBER 18, 2024; 9:00 A.M.</p> <p>2 <b>JUDGE RODRIGUEZ:</b> State your name.</p> <p>3 <b>THE WITNESS:</b> Albert Alonzo.</p> <p>4 ALBERT ALONZO,</p> <p>5 having been first duly sworn, testified as follows:</p> <p>6 <b>EXAMINATION BY MS. STEELE:</b></p> <p>7 Q. Good morning, Mr. Alonzo. My name is Laura Steele. I'm a trial attorney with the United States Department of Justice U.S. Trustee Program. We're here today in your deposition in the Jackson Walker fee matter.</p> <p>12 MS. STEELE: And I want to thank the Court for allowing us to be here today and setting up the courtroom for our use.</p> <p>15 <b>BY MS. STEELE:</b></p> <p>16 Q. Mr. Alonzo --</p> <p>17 MS. STEELE: I believe there probably should be some appearances, Your Honor.</p> <p>19 <b>JUDGE RODRIGUEZ:</b> Go right ahead.</p> <p>20 MS. GARZA: Vianey Garza for the U.S. Trustee.</p> <p>22 MR. NGUYEN: Ha Nguyen for the U.S. Trustee.</p> <p>24 MS. SALL: Millie Sall on behalf of the U.S. Trustee.</p>	<p style="text-align: right;">Page 15</p> <p>1 <b>MS. HARRISON:</b> Julie Harrison for Jackson Walker.</p> <p>3 <b>MS. SMITH:</b> Emily Smith for Jackson Walker.</p> <p>5 <b>MS. STEELE:</b> All right. Thank you, Your Honor. Before we get started is there anything that the Court wanted to set any parameters or anything like that before we launch into this?</p> <p>9 <b>JUDGE RODRIGUEZ:</b> No. We can go ahead and get started. Are there any scheduled breaks you're going to take for witness testimony or break for lunch or anything like that? For planning I would just like to know what kind of schedule you're going to have today. I'm happy to do whatever y'all want to do today.</p> <p>15 MS. STEELE: Thank you, Your Honor. I imagine we'll take some breaks, and during some of those breaks we can get a gauge for where we are.</p> <p>18 <b>BY MS. STEELE:</b></p> <p>19 Q. All right. Good morning, Mr. Alonzo. Thank you for being here today. Could you please state your full name.</p> <p>22 A. Albert Alonzo.</p> <p>23 Q. And, Mr. Alonzo, what is your current address?</p> <p>24 A. 3106 Bramble Hill Court, Houston, Texas 77059.</p> <p>25 Q. And, Mr. Alonzo, have you used any other names?</p>
<p style="text-align: right;">Page 14</p> <p>1 <b>MR. LEMMON:</b> Steve Lemmon on behalf of the JCPenney Plan Administrators.</p> <p>3 <b>MR. GUERRERO:</b> Aaron Guerrero on behalf of David Dunn, liquidating trustee of Basic Energy; David Dunn, the plan agent for 4E Brands North America; and Matthew Ray, plan administrator of Tug Robert J. Bouchard Corporation.</p> <p>8 <b>MR. HIGGINBOTHAM:</b> Craig Alexander Higginbotham on behalf of Randy Williams, Chapter 7 Trustee.</p> <p>11 <b>MS. BREWSTER:</b> Carissa Brewster on behalf of Patrick Bartels as trustee of the Strike Liquidating Trust.</p> <p>14 <b>MR. EISENBERG:</b> Philip Eisenberg with Locke Lord on behalf of Seadrill Limited, Your Honor.</p> <p>16 <b>MR. HARDIN:</b> Rusty Hardin on behalf of Jackson Walker.</p> <p>18 <b>MS. HARDY:</b> Jennifer Hardy on behalf of the DIP lenders in the Sanchez case.</p> <p>20 <b>MR. DOWNEY:</b> Christopher Downey on behalf of Mr. Alonzo.</p> <p>22 <b>MR. JENKINS:</b> William Jenkins. I'm the general counsel of Jackson Walker.</p> <p>24 <b>MR. BOLAND:</b> Jason Boland for Jackson Walker.</p>	<p style="text-align: right;">Page 16</p> <p>1 A. No.</p> <p>2 Q. Mr. Alonzo, your counsel is present here today.</p> <p>3 We're slightly in an unusual configuration, but I do 4 want to let you know that you certainly are welcome 5 to -- if you need to speak with your counsel or anything 6 like that, please just let me know; and we'll certainly 7 allow you to do that.</p> <p>8 Mr. Alonzo, have you ever been deposed 9 before?</p> <p>10 A. No, ma'am.</p> <p>11 Q. So I'm going to ask questions. If you'll let 12 me ask my question, I'll let you answer your answer. 13 We'll try not to speak over one another. Try to use 14 verbal responses, not be "uh-huh," yeah, nod head kind 15 of thing. So I appreciate that.</p> <p>16 Again, your counsel is here. So if 17 there's anything that I ask that you don't understand, 18 feel free to just let me know that. I can restate or 19 you can consult with your counsel as well.</p> <p>20 A. Understood.</p> <p>21 Q. Thank you. Mr. Alonzo, what is your highest 22 level of education?</p> <p>23 A. I have a bachelor's degree.</p> <p>24 Q. From where?</p> <p>25 A. University of Houston Downtown.</p>

<p style="text-align: right;">Page 105</p> <p>1 Q. Was the relationship -- and I understand that 2 your understanding was that it was a private matter and 3 should be kept private. Was it actually private? Was 4 it actually kept secret?</p> <p>5 A. I mean, I think so.</p> <p>6 Q. Did anyone ask you questions about their 7 relationship?</p> <p>8 A. Nobody has ever approached me about their 9 relationship.</p> <p>10 Q. So Mr. Jones -- when the United States Trustee 11 interviewed Ms. Freeman, she stated that -- she was 12 asked, "Did anyone ask you about whether you denied the 13 relationship?"</p> <p>14 And she responded, "I'm sure there were 15 people. I know that there were people who have -- a few 16 have asked. But people didn't really ask me, you know. 17 They would ask Albert."</p> <p>18 A. She's wrong about that. Nobody ever asked me 19 about it.</p> <p>20 Q. Why would she testify that people asked you 21 about it if that's not correct?</p> <p>22 A. I don't know.</p> <p>23 Q. And I apologize. She wasn't testifying; she 24 was being interviewed.</p> <p>25 A. Right.</p>	<p style="text-align: right;">Page 107</p> <p>1 A. She does not.</p> <p>2 Q. What was her reaction to that when you shared 3 it with her?</p> <p>4 A. Like in 2013? She didn't really know them 5 then.</p> <p>6 Q. Let me step back. When did you share the 7 relationship with your wife?</p> <p>8 A. Probably -- I mean, I honestly don't remember.</p> <p>9 Q. Would you have come home that evening after the 10 happy hour and said, Guess what, they're together?</p> <p>11 A. Probably.</p> <p>12 Q. And what was her reaction to that?</p> <p>13 A. You know, she didn't know them and she -- I 14 don't recall or have a recollection of her reaction to 15 it.</p> <p>16 Q. Did you send Mr. Jones a Christmas card?</p> <p>17 A. I have sent him one before, yes.</p> <p>18 Q. And who would you address that Christmas card 19 to?</p> <p>20 A. I would have sent it to him, and as a joke I 21 would have said "Mr. and Mrs. Freeman" probably.</p> <p>22 Q. And was that every year after 2013?</p> <p>23 A. It's whenever my wife bought the cards.</p> <p>24 Q. Did she sign the cards?</p> <p>25 A. She usually did those pictures, you know. And</p>
<p style="text-align: right;">Page 106</p> <p>1 Q. But no one ever asked you about their 2 relationship?</p> <p>3 A. No, ma'am. As I sit here today, nobody has 4 ever asked me prior to 2020 -- prior to it becoming 5 public about it.</p> <p>6 Q. Okay. Why would she have the impression that 7 people were asking you about the relationship prior to 8 2020 in October?</p> <p>9 A. I don't know.</p> <p>10 Q. Did you ever share the relationship with 11 anyone, or the existence of the relationship with anyone 12 besides Ms. Miller and Ms. Staples?</p> <p>13 A. No, ma'am.</p> <p>14 Q. Did you tell your wife?</p> <p>15 A. My wife knew.</p> <p>16 Q. And did your wife tell anyone?</p> <p>17 A. I doubt it.</p> <p>18 Q. Did you tell your wife to keep it secret?</p> <p>19 A. No, I don't believe I did. I mean, it was --</p> <p>20 my wife is in a different world than we are, and she's 21 so detached from it that it's in one ear and out the 22 other for her.</p> <p>23 Q. She's not an attorney?</p> <p>24 A. She's not an attorney.</p> <p>25 Q. And she doesn't work in the legal world?</p>	<p style="text-align: right;">Page 108</p> <p>1 if we would have sent one -- I don't know when we sent 2 them. If I would have sent one, it wouldn't have 3 been -- it would have probably been to the Rolla house.</p> <p>4 Q. And why would you send it to the Rolla house as 5 opposed to any other address?</p> <p>6 A. I mean, probably couldn't afford it the other 7 years, to be honest with you.</p> <p>8 Q. But did you understand that the Rolla address 9 was the best place to mail something to --</p> <p>10 A. Yes, ma'am.</p> <p>11 Q. -- Ms. Freeman or Mr. Jones?</p> <p>12 A. For Jones for sure.</p> <p>13 Q. And what is the joke there, Mr. and 14 Mrs. Freeman?</p> <p>15 A. You know, I knew they were dating; and I wasn't 16 going to send her one. So I would send it to the house.</p> <p>17 Q. You mentioned that you believe that if 18 Judge Isgur had known about the relationship, he would 19 have actually required disclosure. Did you believe at 20 any point that the relationship required disclosure?</p> <p>21 A. I was going off hindsight.</p> <p>22 Q. So in 2013 you didn't say, Hey Liz, I think you 23 need to --</p> <p>24 A. No, ma'am.</p> <p>25 Q. Do you know whether Mr. Jones and Ms. Freeman</p>